

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	CASE NUMBER:
	§	
VANDERHALL EXOTICS OF	§	17-34196 (DRJ)
HOUSTON, LLC	§	(Chapter 11)
	§	
DEBTOR	§	

**EMERGENCY APPLICATION OF THE UNITED STATES TRUSTEE  
FOR ORDER APPROVING APPOINTMENT OF CHAPTER 11 TRUSTEE**

TO THE HONORABLE DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW the United States Trustee for the Southern District of Texas, by and through the undersigned counsel, who respectfully moves this Court for an order under Fed. R. Bankr. P. 2007.1(c) approving the appointment of Randy W. Williams as chapter 11 trustee, and represents as follows:

1. On July 11, 2017, the Court entered the Order [Dkt. No. 38] directing the United States Trustee (the "Applicant") to appoint a chapter 11 trustee.
2. The Applicant has appointed Randy W. Williams ("Williams") to serve as the chapter 11 trustee. Williams is an attorney licensed to practice in the State of Texas. His office is located at 333 Clay Street, Suite 3300, Houston, Texas, 77002. His telephone number is (713) 653-8645. The Applicant has selected Williams because he is well-qualified to serve as chapter 11 trustee. Williams is a chapter 7 trustee in the Southern District of Texas. He has the knowledge and experience required to fulfill the duties of a chapter 11 trustee in this case.
3. Counsel for the Applicant has consulted with the following parties in interest regarding the appointment of a chapter 11 trustee:
  - a. Nations Equipment Finance, L.L.C. and Nations Fund I, LLC, by and through Attorney Michael D. Warner.

- b. Westlake Flooring Company, L.L.C. dba Westlake Flooring Services, by and through Attorney Mark A. Platt.
  - c. Third Coast Bank SSB, by and through Attorney Michael Durrschmidt.
  - d. Westbound Bank, by and through Attorney Edward Rothberg.
  - e. TD Auto Finance, by and through Attorney Stephanie L. Tolson.
4. To the best of the Applicant's knowledge, Williams' connections with the Debtor, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, are limited to the connections set forth in the Verified Statement filed in support of this Application.

WHEREFORE, PREMISES CONSIDERED, the Applicant respectfully requests that this Court enter an order approving the appointment of Randy W. Williams as the chapter 11 trustee, and for any and all further relief as may be equitable and just.

Dated: July 12, 2017

Respectfully Submitted,

JUDY A ROBBINS  
UNITED STATES TRUSTEE

By: /s/ Hector Duran  
Hector Duran  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all PACER System participants by United States Mail, first class, postage prepaid, or by ECF transmission, on the 12th day of July, 2017.

/s/ Hector Duran  
Hector Duran